

# **APPENDIX B**

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;  
17 OTTOMOTTO, LLC; OTTO TRUCKING  
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S SUPPLEMENTAL  
RESPONSES AND OBJECTIONS TO  
DEFENDANT UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S THIRD  
SET OF REQUESTS FOR ADMISSION  
(NO. 20)**

United States District Court Northern District of California <b>Trial Exhibit 2982</b> Case No. <u>3:17-cv-00939-WHA</u> Date Entered _____ By _____ Deputy Clerk
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No. 3:17-cv-00939-WHA

WAYMO'S SUPPLEMENTAL RESPONSES AND OBJECTIONS TO UBER AND OTTOMOTTO'S THIRD SET OF RFAs (NO. 20)

**REQUEST FOR ADMISSION NO. 20:**

Admit that on June 20, 2017, a lawyer for Waymo inspected Uber's facility at 50 33rd Street in Pittsburgh, Pennsylvania, including the computers of Scott Boehmke and John Bares, and the work spaces of several LiDAR hardware engineers, including Scott Boehmke and Jim Gasbarro.

**SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

~~Subject to and without waiving its objections, Waymo responds as follows:~~

Waymo admits that on June 20, 2017, a lawyer representing Waymo inspected Uber's facility at 50 33<sup>rd</sup> Street in Pittsburgh, Pennsylvania, including the computers of Scott Boehmke and John Bares, and the work spaces of certain LiDAR hardware engineers, including Scott Boehmke. Waymo otherwise denies the request.

DATED: August 30, 2017

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven  
Attorneys for WAYMO LLC

WAYMO  
OBJECTIONS

Objection  
401, 402,  
403M, 403P